

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FREE SPEECH SYSTEMS LLC, Debtor.	§ § § §	Chapter 11 (Subchapter V) Case No. 22-60043
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**EMERGENCY MOTION TO SUPPLEMENT AND CORRECT ORDER DIRECTING
THE PAYMENT OF ALLOWED PROFESSIONAL FEES**
[Related to Doc No. 1015]

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing. Represented parties should act through their attorney.

Emergency relief has been requested. If the Court considers the motion on an emergency basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency consideration is not warranted, you should file an immediate response.

To Judge Christopher López, United States Bankruptcy Judge:

Melissa Haselden, the former Subchapter V Trustee (“**Haselden**”) for Free Speech Systems LLC (“FSS”), files this Emergency Motion to Supplement Order Directing Payment of Allowed Professional Fees entered at Docket No 1015 and in support thereof, states as follows:

1. FSS filed a voluntary petition for relief under Chapter 11 Subchapter V of the Bankruptcy Code on July 29, 2022 [Docket No. 1]. On August 2, 2022, Melissa Haselden was appointed Subchapter V Trustee [Docket No. 22].
2. On June 14, 2024, the Court conducted a joint hearing regarding the future of the bankruptcy cases of FSS and its sole member, Alexander E. Jones (“Jones”). The Court converted

the Jones case to one under chapter 7 of the Bankruptcy Code. Christopher R. Murray (“Murray”) was appointed as the chapter 7 Trustee.

3. The Court determined that the FSS case should be dismissed. However, the Court noted the need to address FSS administrative expenses. The FSS case was dismissed by order entered on June 21, 2024 (the “Dismissal Order”) [Docket No. 956]. The Dismissal Order retained the Court’s exclusive jurisdiction to consider applications for approval of professional fees and expenses and further authorized the CRO to transfer control and signing authority with regards to FSS’ bank accounts to Murray in his capacity as the Jones’ chapter 7 Trustee.

4. The Court approved fee applications for a number of professionals. On September 6, 2024, the Court entered an order directing the chapter 7 Trustee to remit payment to the professionals of the approved fees (“Order”)[Docket No. 1015]. Attached to the Order as Exhibit A is a summary of unpaid professional fees.

5. Subsequent to the entry of the Order, it was discovered that (i) the allowed compensation owed to Hap May and M3 differed from the amounts listed in Exhibit A to the Order and (i) Exhibit A to the Order inadvertently omitted payment of approved professional fees owed to Martin, Disiere, Jefferson & Wisdom, LLP. A supplemental and corrected Exhibit A is attached hereto.

6. Therefore, Haselden requests, pursuant to 11 U.S.C. § 105 and in furtherance of the Dismissal Order, that the Order be supplemented to require Christopher R. Murray, in his capacity as chapter 7 Trustee of the Alexander E. Jones estate, be directed to pay from FSS funds, the additional allowed professional fees in the remaining balances owed as reflected in Exhibit A to this Motion and the order filed with this motion.

Wherefore, Melissa Haselden requests that the Court enter the order filed with this motion and grant any further relief that may be appropriate.

DATED: October 2, 2024

Haselden Farrow PLLC

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Former Subchapter V Trustee for Free
Speech Systems, LLC

CERTIFICATE OF SERVICE

I certify that on October 2, 2024, a copy of this Motion was sent to the parties listed below by the Court's ECF notification system, was send via e-mail to counsel to all parties for PQPR, Alexander Jones, and the Sandy Hook Families.

/s/ Melissa A. Haselden
Melissa A. Haselden